

COMMENTS ON BARRATT AMENDMENTS TO APP/18/00724

Reference : Barratt letter to HBC Planning Department dated 11 September 2019.

1. **Introduction.** In their letter at reference, Barratt would appear to have dismissed many of the concerns expressed by HBC Planning at their joint meeting on 7 August 2019. Below are comments on the latest submission by Barratt on the proposed Sinah Lane development for 195 dwellings.
2. **Local Plan** (Ref Para 1). Barratt Homes has made an assumption that the draft Local Plan, although incomplete, has enough substance/content for their application to be considered in terms of “the amount, distribution and location of the development”. In their letter they advise that HBC should take a balanced view in seeking to approve this sustainable development. This overbearing approach by the developer indicates that they expect HBC to make a premature decision without the full policy guidance available.
3. **Nationally-Described Space Standards (NDSS)** (Ref Para 1). Barratt Homes highlights “a number of significant drawbacks with the NDSS approach”. By their own admission, they do not conform to some NDSS standards but state that the process is incomplete and not available for 9-12 months. Barratt intimates that HBC should disregard some standards under NDSS as they afford little weight to their application. Who are they to decide on which standard HBC should follow?
4. **Balconies on Flats** (Ref Para 1). Barratt cites another development with flats without balconies which HBC recently approved (Forty Acre Farm). They use this example as setting a precedent; however, they completely disregard HBC’s request/requirement for balconies on this particular development with its rural views.
5. **Low Carbon Design** (Ref Para 1). Barratt, although fully agreeing with the principle of power-carbon design, admit that their application “does not fully comply the precise aspiration under E12 (f)”. Again, they use the excuse that the lack of formal low carbon policies is enough for HBC to agree to their application within current building/low carbon standards. The developer has not included the latest eco-friendly measures such as triple glazing, large windows for more light, solar panels etc. in this amended application, presumably on building cost grounds.
6. **Electric Car Charging Points** (Ref Para 1). Barratt advise that only homes with garages will be fitted with car charging points but the proposed design and layout of the site would enable additional points to be fitted post-occupation. This proposal would only cause unnecessary disruption/inconvenience to residents and should be included in development plans.
7. **Provision of Allotments** (Ref Para 2). Barratt has agreed to discuss further the requirement for allotments with HBC. Any planning for allotments for residents would presumably be to the north or the south of the development. Whichever is decided would impact on the

already much reduced Wade and Brent Goose Refuge area and extend beyond the North Shore Road northern boundary line into the flood plain region.

8. **Parking Provision** (Ref Para 3). Barratt has rejected the request by HBC for additional 83 parking spaces on the grounds of the impact on their landscape and design. However, Policy IN3 is still under review and planning should not be agreed until such policy(ies) are agreed and published by HBC, the policy makers – and not Barratts.
9. **Landscaping** (Ref Para 4). This is another example of Barratt not meeting the HBC requirements as specified by the Councils Landscape Team and potential customer expectations. Their Landscape Consultant is further reviewing alternative proposals and these should be reviewed and agreed by HBC before further action takes place.
10. **Housing Mix** (Ref Para 5). Barratt has advised HBC that their housing mix table is “incorrect in relation to what is being proposed”. However, the policy requires a range of dwelling types and sizes to meet local needs. Hayling Island has a large number of retirees and elderly people who require single storey bungalow style accommodation or houses with stairlifts etc. Also, the house designs are completely out of character with the local West Hayling area apart from more recent developments off Station Road. The Barratt housing mix should be completely revisited to meet local housing needs and not to benefit the developer’s commercial aspirations.

11. Other Consultation Responses

- a. **RSPB.** As a local resident close to the proposed development site, it is very obvious that the RSPB Consultation document is seriously flawed. The RSPB cannot have been made fully aware of the wintering and feeding habits of the Waders and Brent geese during 2018/19 winter months and the change in crop planting in the site field. It is understood that the RSPB has been updated on this issue and it is recommended that both HBC and Barratt get a full briefing from the RSPB once they have reviewed the local resident’s input.
- b. **Environmental Health.**
 - Groundwater.** Sampling for contamination is an outstanding issue and should be addressed, especially as the field is subject to flooding after heavy rainfall and, to the north, from Langstone Harbour after tidal surges often affected by pollution from sewage. It is noted that winter level monitoring was carried out in 2016/17; however, photographic evidence shows considerable flooding in both the south and north parts of the field during 2017/18 and 2018/19. Therefore, the Barratt winter level monitoring data is out of date and further groundwater monitoring should be carried out by the developer.
 - Drainage/Sewage.** After the recent sewage pump failures and spillages into Langstone Harbour it is strongly urged that HBC looks very closely at the Barratt solution for pump failure using emergency ground storage. External specialist advice indicates that there is a need for at least a permanent pumping station and backup generator to support such a large housing development. It is recommended that HBC seek further professional advice on this critical environmental/health and safety issue which could impact on the Island’s sewage/wastewater infrastructure.

Presumably Barratt has agreed in principle for the Local Sewage Authority to manage the system in perpetuity as stated in the reference at page 11 para 1.

Transport. Barratt advise that they expected that the revised Traffic Assessment was due out in September at their time of writing. However, this major issue for Hayling Island is still outstanding and it is understood that the HI Infrastructure Advisory Committee has still not been involved in the recent revised process under the Satchwell Amendment. It is strongly urged that no further action is taken on this application or any other building applications on Hayling Island until the HBC Local Plan is fully agreed, completed and issued to all interested parties.

c. Other Issues.

Natural England. See also RSPB sub para above. Natural England has been appraised by a local resident of the possible breach of their 2013 Mitigation Strategy for the Protection of Dark Bellied Brent Geese on Hayling Island. It is understood that Natural England is reviewing the issue and HBC are requested to follow up with this Agency before any decision is made.

Southern Water. It is noted that Southern Water has not raised any objections. However, it should be noted that they have lost credibility after their recent shocking performance on Hayling Island and other parts of the county. This is known by HBC and has been widely publicised in the local media. Despite their confidence, the ability for Southern Water to manage/cope with additional pressure on the infrastructure from this development for which they are responsible is highly questionable.

Ecology. See RSPB/Natural England sub-paras above.

County Archaeologist. It would appear that the requirements for assessments and field work report are still outstanding. Presumably HBC will insist on this being carried out before a planning decision is made.

Public Responses to the Local Plan. It is understood that the responses to the Local Plan have not as yet been forwarded to the Government authorities by HBC. Many of the issues and concerns raised above were also voiced in the responses to the Local Plan by Hayling Island residents.

12. **Conclusion.** In this latest amendment Barratt has run roughshod and been blatantly dismissive over many of the local and National current and emerging policies. It is hoped that the HBC Planning decision-makers will stand firm against this “arrogant and bullying” attitude during their deliberations over this application. Also, it is urged that this and any future development applications (including windfall building) are put on hold on Hayling Island until both the final version of the Local Plan and response from the Government have been promulgated to all stakeholders and customers, including Hayling Island residents.

We continue to strongly OBJECT to this application.